

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EMBER RUSSELL,

Plaintiff,

V.

LONG VIEW RECREATIONAL  
VEHICLES, INC. AND LONG VIEW  
RV SUPERSTORES,  
Defendant.

CIVIL ACTION NO. 04-30031-KPN

JOINT MOTION TO MODIFY PRETRIAL  
SCHEDULING ORDER

The parties to the above-entitled matter respectfully request that the Pretrial Scheduling Order be amended as follows:

1. Paragraph 3 be amended to allow for non-expert depositions be completed by February 28, 2005.
2. Paragraph 4 be amended to allow for requests for admission to be served by August 15, 2005 with responses due by September 15, 2005.

As grounds for this motion, the parties state that they have been diligently working to resolve outstanding discovery disputes without the intervention of the Court. However, it is likely that despite the parties' best efforts, some intervention by the Court will be necessary. The parties request the additional time to attempt to get the necessary documentation to complete non-expert depositions.

Respectfully submitted,

THE PLAINTIFF  
By her Attorney,

THE DEFENDANTS  
By their attorney

/s/ Suzanne Garrow  
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#### CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served upon the attorney of record for the Defendants by electronic mail on this date.

Dated: November 5, 2004

/s/ Suzanne Garrow  
Suzanne Garrow